

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

<b>DAVID FALTERMEIER, on behalf of</b>	)	
<b>himself and all others similarly situated,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 4:15-cv-00491-DGK</b>
	)	
<b>FCA US LLC,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF’S MOTION FOR CLASS CERTIFICATION**

Plaintiff David Faltermeier (“Plaintiff”), pursuant to Federal Rule of Civil Procedure 23, hereby moves the Court to certify this lawsuit as a class action.

Plaintiff asserts a claim against Defendant FCA US LLC (“FCA”) under the Missouri Merchandising Practices Act (“MMPA”), Mo Rev. Stat. § 407.010 et seq., on behalf of himself and other similarly situated consumers who purchased certain Jeep-brand vehicles that were misrepresented by FCA with respect to safety, design and performance. For the reasons set forth in the supporting suggestions filed contemporaneously with this Motion, Plaintiff submits that the Court should certify the following class:

All current owners of a Model Year 2002-2007 Jeep Liberty vehicle or a Model Year 1993-1998 Jeep Grand Cherokee vehicle that was not equipped with a fuel tank shield/skid plate at the time of purchase, who purchased the vehicle in the State of Missouri for personal, family or household purposes at any time from June 4, 2013 to the present.

WHEREFORE, Plaintiff David Faltermeier respectfully requests that the Court grant this Motion for Class Certification and enter an order certifying this lawsuit to proceed as a class action on behalf of the proposed class as defined above.

Respectfully submitted,

SHANK & MOORE, LLC

By: /s/ Stephen J. Moore

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*Attorneys for Plaintiff David Faltermeier*

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that the foregoing document was filed this 22nd day August, 2016, via the Court's CM/ECF system, which shall send electronic notice of the same to the following counsel of record:

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